

## **IN THE CLAIMS**

Please amend the claims as indicated:

- 1 1. (previously presented) A computer implemented method which models failure of  
2 a borehole in a subsurface formation, the method comprising;;  
3 (a) defining a subsurface model in the computer, the model including a  
4 plurality of regions, said plurality of regions including the borehole and at  
5 least one additional region selected from (i) a liner in the borehole, (ii) a  
6 casing in the borehole, and (iii) at least one earth formation , each of said  
7 plurality of regions comprising a plurality of nodes interconnected by a  
8 plurality of linkages,  
9 (b) defining material properties associated with said nodes and said linkages  
10 of said subsurface model, said material properties having a statistical  
11 variation;  
12 (c) specifying an initial deformation pattern of the model; and  
13 (d) using a dynamic range relaxation algorithm (DRRA) implemented on the  
14 computer to find a force equilibrium solution for said subsurface model  
15 and said initial deformation pattern giving a resulting deformed model  
16 including fracturing.  
17
- 1 2. (original) The method of claim 1, wherein said nodes are arranged in a grid that is  
2 one of (i) a triangular grid, and, (ii) a random grid.  
3
- 1 3. (currently amended) The method of claim 1 wherein said linkages are selected

2 from the group consisting of (A) springs, (B) beams, ~~and (C) rods~~ and (C) rods.

3

1 4. (original) The method of claim 1 wherein said linkages comprise springs, the  
2 method further comprising defining a normal force associated with each spring.

3

1 5. (original) The method of claim 1 wherein said linkages comprise beams, the  
2 method further comprising defining at least one of (A) a normal force, and (B) a  
3 shear force associated with each beam.

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1 6. (original) The method of claim 1 wherein said linkages comprise rods, the method  
2 further comprising defining at least one of (A) a normal force and (B) a force  
3 associated with an angle between pairs of said adjacent ones of the plurality of  
4 rods.

5

1 7. (original) The method of claim 1, wherein using the dynamic range relaxation  
2 algorithm further comprises applying said initial deformation model in a plurality  
3 of steps, each step comprising applying a specified fraction of the initial  
4 deformation and determining if any linkages between the nodes have been  
5 deformed beyond a breaking point and identifying a subset of the linkages that  
6 have been so deformed.

7

1 8. (original) The method of claim 7, wherein applying the dynamic range relaxation  
2 algorithm further comprises iteratively breaking the one linkage of the subset of

3 linkages that has been deformed the most and applying a relaxation algorithm to  
4 the remaining unbroken linkages.

5

1 9. (currently amended) The method of ~~claim 9~~ claim 1 wherein the at least one earth  
2 formation further comprise a near earth formation including a gravel pack and a  
3 far earth formation.

4

1 10. (original) The method of claim 1 wherein the plurality of regions comprises a  
2 liner in the borehole, an earth formation including a near earth formation and a far  
3 earth formation, and a gravel pack disposed between the liner and the near earth  
4 formation.

5

1 11. (original) The method of claim 1 wherein said linkages connect at least one  
2 selected node of said plurality of nodes with (i) a plurality of nearest neighbors of  
3 the at least one selected node, and (ii) a plurality of next nearest neighbors of the  
4 at least one selected node.

5

1 12. (original) The method of claim 1 wherein said earth formations include a fluid,  
2 said fluid flowing into the borehole, and said deformation pattern is determined in  
3 part by a decrease in formation fluid pressure resulting from flow of said fluid  
4 into the borehole.

5

6 13. (original) The method of claim 12 wherein using the DRRA further comprises

7 determining an additional force at each node related to a difference in said fluid  
8 pressure on opposite sides of at least a subset of the plurality of nodes.

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1 14. (original) The method of claim 13 wherein determining said additional force  
2 further comprises performing a simulation selected from (i) a finite difference  
3 simulation, and, (ii) a finite element simulation, of said fluid flow.

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1 15. (original) The method of claim 14 wherein performing said simulation further  
2 comprises changing at least one of (A) a permeability, and, (B) a porosity used in  
3 said simulation responsive to said deformation.

4

1 16. (original) The method of claim 1 wherein said borehole includes a substantially  
2 vertical section wherein said initial deformation pattern is substantially  
3 azimuthally symmetric about an axis of the borehole in said section.

4

1 17. (original) The method of claim 16 wherein said borehole includes a deviated  
2 section wherein said initial deformation pattern is asymmetrical about an axis of  
3 the borehole.

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1 18. (currently amended) A computer implemented method ~~which~~ which models  
2 failure of a borehole in a subsurface formation, the method comprising:  
3 (a) defining a subsurface model in the computer, the model having a plurality  
4 of nodes and including a plurality of regions, said plurality of regions

5 including the borehole and at least one additional region selected from (i)  
6 a liner in the borehole, (ii) a casing in the borehole, and (iii) at least one  
7 earth formation, each of said plurality of regions comprising a plurality  
8 of nodes interconnected by a plurality of linkages,  
9 (b) defining material properties associated with said nodes and said linkages  
10 of said subsurface model, said material properties having a statistical  
11 variation;  
12 (c) specifying a force distribution applied to the model at boundary nodes of  
13 said plurality of nodes; and  
14 (d) using a dynamic range relaxation algorithm (DRRA) implemented on the  
15 computer to find a force equilibrium solution for said subsurface model  
16 and said force distribution giving a resulting deformed model including  
17 fracturing.

18

1 19. (original) The method of claim 18 wherein the subsurface formation has been  
2 subjected to large scale geologic deformation and wherein specifying said force  
3 distribution further comprises:

4 (i) simulating the large scale geologic deformation to determine a stress  
5 distribution in the subsurface formation in the absence of the borehole,  
6 (ii) defining a trajectory for the borehole therein, and  
7 (iii) identifying locations along said trajectory that are likely to fail.

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1 20. (original) The method of claim 18 wherein the forces can vary between the  
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2 boundary nodes.

3

1 21. (original) The method of claim 19 wherein identifying said trajectories further  
2 comprises removing a plurality of nodes along said trajectory.

3

1 22. (original) The method of claim 18, wherein said nodes are arranged in a grid that  
2 is one of (i) a triangular grid, and, (ii) a random grid.

3

1 23. (currently amended) The method of claim 18 wherein said linkages are selected  
2 from the group consisting of (A) springs, (B) beams, ~~and, (C) rods~~ and (C) rods.

3

1 24. (original) The method of claim 18 wherein said linkages comprise springs, the  
2 method further comprising defining a normal force associated with each spring.

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1 25. (original) The method of claim 18 wherein said linkages comprise beams, the  
2 method further comprising defining at least one of (A) a normal force, and (B) a  
3 shear force associated with each beam.

4

1 26. (original) The method of claim 18 wherein said linkages comprise rods, the  
2 method further comprising defining at least one of (A) a normal force and (B) a  
3 force associated with an angle between pairs of said adjacent ones of the plurality  
4 of rods.

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1 27. (original) The method of claim 18, wherein using the dynamic range relaxation  
2 algorithm further comprises applying said force distribution in a plurality of steps,  
3 each step comprising applying a specified fraction of the initial force and  
4 determining if any linkages between the nodes have been deformed beyond a  
5 breaking point and identifying a subset of the linkages that have been so  
6 deformed.

1 28. (original) The method of claim 27, wherein applying the dynamic range  
2 relaxation algorithm further comprises iteratively breaking the one linkage of the  
3 subset of linkages that has been deformed the most and applying a relaxation  
4 algorithm to the remaining unbroken linkages.

1 29. (currently amended) A computer implemented method which models faulting and  
2 fracturing in a subsurface volume of the earth comprising:  
3 (a) ~~defining~~ defining a subsurface model in the computer, the model including  
4 a plurality of interconnected nodes and material rock properties within the  
5 subsurface volume;  
6 (b) specifying a stress distribution at a subset of said plurality of nodes, said  
7 subset comprising boundary nodes; and  
8 (c) using a dynamic range relaxation algorithm implemented on the computer  
9 to find a force equilibrium solution for said subsurface model and said  
10 stress distribution giving a resulting deformed model including fracturing.

11

1 30. (original) The method of claim 29, wherein defining a subsurface model, and  
2 specifying said stress distribution further comprises using a graphical user  
3 interface.

4

1 31. (original) The method of claim 29, wherein said nodes are arranged in a grid that  
2 is one of (i) a triangular grid, and, (ii) a random grid.

3

1 32. (original) The method of claim 29, wherein said nodes are interconnected by  
2 linkages selected from (i) springs, (ii) beams, and, (iii) rods.